



COUNCILMEMBER DONNA FRYE

**City of San Diego
Sixth District**

MEMORANDUM

DATE: October 8, 2007
TO: David Wescoe, SDCERS Retirement Administrator
FROM: Councilmember Donna Frye
SUBJECT: IRS Documents

Please provide a copy of the written authority from the IRS supporting the legality of the Deferred Retirement Option Program (DROP). Also, please include any IRS and/or outside attorney opinions regarding the establishment, funding, and tax exempt or non-exempt status of the DROP program, contributions thereto or distributions therefrom.

Thank you for your prompt response.

CC: Honorable City Council
Honorable Mayor Sanders
City Attorney, Michael Aguirre
Independent Budget Analyst, Andrea Tevlin
Stanley Keller, Independent Monitor
SDCERS Boardmembers

DF/ks